

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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JUN 2 1995

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of)
)
Preparation for International)
Telecommunication Union World)
Radiocommunication Conferences)

IC Docket No. 94-31

COMMENTS OF
MOBILE MARINE RADIO, INC.
RELATING TO AGENDA FOR 1997
WORLD RADIOCOMMUNICATION CONFERENCE

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To: The Commission

Mobile Marine Radio, Inc. (MMR), respectfully submits these Comments to Federal Communications Commission, in supplement to the record in this Inquiry specifically concerning the agenda for the 1997 World Radiocommunication Conference.^{1/}

^{1/} MMR asks for consideration of these Comments notwithstanding that they are submitted after the close of the formal Comment and Reply Comment period in this proceeding. As set forth below, MMR's Comments arise out of the Commission's Further Notice of Proposed Rulemaking, *Amendment of the Commission's Rules Concerning Maritime Communications*, PR Docket No. 92-257 (FCC 95-177, Rel. May 25, 1995). Consideration of the 1997 WRC Agenda items set forth herein is essential in order to correlate the Commission's regulatory policies and provisions with the international Radio Regulations.

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I. Statement of Interest

Mobile Marine Radio is a Commercial Mobile Radio Service provider rendering telecommunications services to the maritime user community, both domestically and internationally. MMR is the leading provider of terrestrial maritime telecommunication services in the United States, and is the only domestic Commercial Mobile Radio Service provider to offer a full range of radiotelephone, radiotelegraphy, radiotelex and radiofacsimile services to ships at sea.

II. COMMENTS

Items relating to the maritime services which preliminarily were identified for inclusion on the agenda for the 1997 World Radiocommunication Conference, other than those relating to satellite services, include distress and safety regulations, Radio Regulations Appendix 18 (156-174 MHz Frequency Table), and Article 61 relating to the order of priority of communications of the maritime mobile service.^{2/} No additional maritime items were identified in

^{2/} See, Resolution No. [COM4/2], Preliminary Agenda for the 1997 World Radiocommunication Conference, published in the Notice of Inquiry in this proceeding at 9 FCC Rcd 2430, 2443 (1994).

the Final Report of the FCC Advisory Committee for the 1995 World Radiocommunication Conference.

On May 25, 1995, the Commission issued a further Notice of Proposed Rulemaking in PR Docket 92-257, *Amendment of the Commission's Rules Concerning Maritime Communications*. In that Notice, the Commission addresses more than a dozen items. While some of those provisions relate to implementation of past changes in international standards, and others to items already identified for inclusion on the 1997 WRC Agenda, e.g., DSC implementation and VHF narrowbanding, other issues represent departures from the international maritime operating protocols and are not presently under consideration for inclusion in the 1997 WRC Agenda. It is those issues which MMR brings to the Commission's attention and requests be included on the 1997 Conference agenda.

Two items being considered by the Commission in PR Docket No. 92-257 bear international operational implications for maritime mobile operations in the 4-27 MHz band. The first of those issues concerns the narrow-band

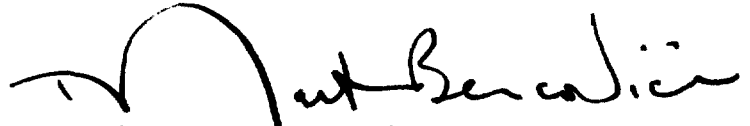
direct-printing service (NB-DP). The Commission proposes to provide flexibility in NB-DP operations, subject to compliance with bandwidth and related limitations to prevent harmful interference to other users. Furthermore, the Commission proposes to permit use of linear frequency modulated continuous wave modulation technology for the purpose of Automatic Link Establishment (ALE) in the Maritime HF frequency bands. This proposal will substantially enhance terrestrial maritime communications.

With regard to both the NB-DP and the ALE issues, international acceptance of the operating flexibility contemplated by the Commission is critical to its successful implementation. The overwhelming majority of ocean-going vessels are operated under foreign flags. Accordingly, the international community must support the changes contemplated by the Commission in order to facilitate the full realization of benefits from improvements in HF technology.

Mobile Marine Radio accordingly urges the Federal Communications Commission to support inclusion in the recommended agenda for the 1997 WRC of an item or items

dealing with the modernization of HF maritime communications standards consistent with the provisions discussed above which are being considered by the Commission in PR Docket No. 92-257.

Respectfully submitted,



Martin W. Bercovici
Attorney for
Mobile Marine Radio, Inc.

June 2, 1995